

PAUL L. REIN, Esq. (SBN 43053)
AARON M. CLEFTON, Esq. (SBN 318680)
REIN & CLEFTON, Attorneys at Law
200 Lakeside Drive, Suite A
Oakland, CA 94612
Telephone: (510) 832-5001
Facsimile: (510) 832-4787
info@reincleftonlaw.com

IRAKLI KARBELASHVILI, Esq. (SBN 302971)
ALL ACCESS LAW GROUP
1400 Coleman Ave Ste F28
Santa Clara, CA 95050
Telephone: (408) 295-0137
Fax: (408) 295-0142
irakli@allaccesslawgroup.com

CATHERINE CABALO, Esq. (SBN 248198)
PEIFFER WOLF CAR KANE & CONWAY LLP
4 Embarcadero Center, Suite 1400
San Francisco, CA 94111
Telephone: (415) 766-3592
Facsimile: (415) 402-0058
ccabalo@peifferwolf.com

Attorneys for Plaintiff
CHRISTINE DiBELLA

**Defense counsel listed after caption*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHRISTINE DiBELLA,

Plaintiff,

v.

BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVERSITY;
COMPASS GROUP USA, INC. dba
CHARTWELLS HIGHER EDUCATION,

Defendants.

CASE NO. 4:21-cv-08461-HSG
Civil Rights

**STIPULATION OF SETTLEMENT AND
ORDER FOR DISMISSAL WITH
PREJUDICE OF DEFENDANT
COMPASS GROUP USA, INC. dba
CHARTWELLS HIGHER EDUCATION
ONLY**

ALISON K. BEANUM, State Bar No. 221968
alison.beanum@clydeco.us
DOUGLAS J. COLLODEL, State Bar No. 112797
douglas.collodel@clydeco.us
CLYDE & CO US LLP
355 South Grand Avenue, Suite 1400
Los Angeles, California 90071
Telephone: (213) 358 7600
Facsimile: (213) 358 7650

Attorneys for Defendant
BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVERSITY

1 Nathan V. Okelberry (SBN 266596)
nokelberry@fisherphillips.com
2 Justin Hall (SBN 329464)
jhall@fisherphillips.com
3 FISHER & PHILLIPS LLP
444 South Flower Street, Suite 1500
4 Los Angeles, California 90071
Telephone: (213) 330-4500
5 Facsimile: (213) 330-4501

6 Attorneys for Defendant
COMPASS GROUP USA, INC., dba
7 CHARTWELLS HIGHER EDUCATION

8
9 **STIPULATION**

10 Plaintiff CHRISTINE DiBELLA (“Plaintiff”) and Defendants BOARD OF TRUSTEES
11 OF THE CALIFORNIA STATE UNIVERSITY (“Government Entity Defendant”); COMPASS
12 GROUP USA, INC. dba CHARTWELLS HIGHER EDUCATION (“Chartwells”) – Plaintiff and
13 Defendants together the “Parties” – hereby stipulate and request that Defendant COMPASS
14 GROUP USA, INC. dba CHARTWELLS HIGHER EDUCATION only be dismissed from this
15 action with prejudice pursuant to FRCP 41(a). Plaintiff and Chartwells have resolved all of
16 Plaintiff’s claims against Chartwells. Accordingly, the Parties hereby stipulate and request the
17 Court to order that all of Plaintiff’s claims in this action against Defendant COMPASS GROUP
18 USA, INC. dba CHARTWELLS HIGHER EDUCATION be dismissed with prejudice, each party
19 to bear its own fees and costs. The Parties request that the Court not dismiss the claims against
20 Defendant BOARD OF TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY which
21 remain active, and which have not been resolved.

22 The Parties request that the Court retain jurisdiction to enforce the injunctive relief
23 measures specified in Exhibit A, attached hereto, pursuant to General Order 56

24 In the event Defendant does not complete the injunctive relief as specified in Exhibit A,
25 Defendant shall have 30 days to correct the deficiencies. After that time, Plaintiff shall be
26 entitled to make a motion to enforce the work contemplated to be done in Exhibit A and shall be
27 entitled to attorney fees and costs for any enforcement action or motion.
28

1 **IT IS SO STIPULATED.**

2 Date: May 13, 2022

REIN & CLEFTON

3 /s/ Aaron Clefton
4 By AARON CLEFTON, Esq.
5 Attorneys for Plaintiff
CHRISTINE DiBELLA

6 Date: May 13, 2022

CLYDE & CO US LLP

7 /s/ Alison K. Beanum
8 By ALISON K. BEANUM, Esq.
9 Attorney for Defendant
10 BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVERSITY

11 Date: May 13, 2022

FISHER & PHILLIPS LLP

12 /s/ Nathan V. Okelberry
13 By NATHAN V. OKELBERRY, Esq.
14 Attorney for Defendants
15 COMPASS GROUP USA, INC, dba
CHARTWELLS HIGHER EDUCATION

16 **FILER'S ATTESTATION**


17 Pursuant to Local Rule 5-1, I hereby attest that I, Aaron Clefton, attorney with Rein &
18 Clefton, received the concurrence of Nathan V. Okelberry, Esq. and Alison Beanum, Esq. in the
19 filing of this document.

20 /s/ Aaron Clefton
21 Aaron Clefton

ORDER

Pursuant to the stipulation of the parties and for good cause shown, IT IS SO ORDERED.

Dated: 5/13/2022


Honorable Haywood S. Gilliam, Jr.
U.S. District Court Judge